UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

IN RE: VALSARTAN, LOSARTAN, AND IRBESARTAN PRODUCTS LIABILITY LITIGATION

THIS DOCUMENT RELATES TO:

Maxine Guillory v. Prinston Pharmaceutical Inc., et. al.

Case No. 1:19-cv-10044-RBK-JS

MDL NO. 2875

HON. ROBERT B. KUGLER

NOTICE OF VIDEOTAPED DEPOSITION OF WALLACE GUILLORY

PLEASE TAKE NOTICE that, in accordance with Rule 30 of the Federal Rules of Civil Procedure and the Fact Witness Deposition Protocol in this case (Case Management Order #20, filed November 17, 2020 - Document 632), Defendants Zhejiang Huahai Pharmaceutical Co., Ltd., Solco Healthcare U.S., LLC, and Prinston Pharmaceutical Inc., will take the deposition upon oral examination of Wallace Guillory, as personal representative for Maxine Guillory, on October 25, 2021 beginning at 10:00 EDT, and continuing until completion, via remote deposition while the witness is at his home or office or other location agreed to by the parties.

Counsel who wish to attend remotely will have the option to do so using audio-visual conference technology and should contact Golkow Technologies at scheduling@golkow.com to arrange for login credentials to be sent to them prior to the deposition. The deposition shall be videotaped and recorded stenographically, and will continue from day to day until completed before a person duly authorized to administer oaths who is not counsel of record or interested in the events of this case. The court reporter and videographer will be an employee or agent of Golkow Technologies.

The attorney contact for the deposition is:

Rachel Good Duane Morris LLP 600 Grant Street, Suite 5010 Pittsburgh, PA 15219 Tel: 412-497-1031

Fax: 412-202-3833

rmgood@duanemorris.com

October 13, 2021

Respectfully submitted,

/s/ Rachel Good

Rachel Good

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Attorney for Zhejiang Huahai Pharmaceutical Co., Ltd., Solco Healthcare U.S., LLC, and Prinston Pharmaceutical Inc.

CERTIFICATE OF SERVICE

I hereby certify that on this 13th day of October, 2021, I caused a true and correct copy of the foregoing Notice of Videotaped Deposition of Wallace Guillory to be filed with the Court's ECF system and served upon counsel of record. I further certify that a copy of the foregoing was originally served on the following Plaintiff's counsel by e-mail, with copies by e-mail to Counsel for Defendants:

Sara Papantonio (counsel for Plaintiff Guillory) Golkow Technologies (via email)

/s/ Rachel Good

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Attorney for Zhejiang Huahai Pharmaceutical Co., Ltd., Solco Healthcare U.S., LLC, and Prinston Pharmaceutical Inc.